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7 IN THE UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

9 ALYSSIA NUNGARAY, a minor, by and
through her parents, FERNANDA JIMINEZ
and ADAN NUNGARAY,

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Plaintiff,

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v.

12 POKROY MEDICAL GROUP OF NEVADA,
13 LTD., d/b/a PEDIATRIX MEDICAL GROUP
14 and d/b/a PEDIATRIX EMERGENCY
15 MEDICINE OF NEVADA, a foreign limited
16 liability company; YARON IVAN, M.D. an
17 individual; VIPUL SINGLA, M.D., an
18 individual; UNITED STATES OF AMERICA;
19 and SUNRISE HOSPITAL AND MEDICAL
20 CENTER, LLC a Nevada limited liability
company; DOES I through X; and ROE
CORPORATIONS XI through XX, inclusive,

Defendants.

CASE NO. 2:25-cv-00014-JAD-MDC

**STIPULATION AND PROPOSED ORDER
TO EXTEND THE DEADLINE FOR
PARTIES TO FILE THE DISCOVERY
PLAN/SCHEDULING ORDER**

21 IT IS HEREBY STIPULATED between Plaintiff, ALYSSIA NUNGARAY, a minor, by
22 and through her parents, FERNANDA JIMINEZ and ADAN NUNGARAY (hereinafter collectively
23 referred to as “Plaintiff”), by and through their counsel Adam J. Breedon, Esq. of BREEDEN &
24 ASSOCIATES, PLLC, and Defendants, POKROY MEDICAL GROUP OF NEVADA, LTD., d/b/a
25 PEDIATRIX MEDICAL GROUP and d/b/a PEDIATRIX EMERGENCY MEDICINE OF
26 NEVADA, YARON IVAN, M.D., and VIPUL SINGLA, M.D, by and through their counsel of
27 record Brittany Lewis, Esq. of HUTCHISON & STEFFEN, PLLC. (hereinafter collectively referred
28 to as “Defendants”), that:

1 **IT IS HEREBY STIPULATED** that the parties shall have until Friday, March 28, 2025 to
2 file the Discovery Plan/Scheduling Order as counsel for Plaintiff had limited availability in the last
3 30 days to conduct the conference. They desire to comply with the deadlines, but need a short
4 amount of additional time.

5 **IT IS SO STIPULATED AND AGREED.**

6 Dated this 21st day of March, 2025.

Dated this 21st day of March 2025.

7 **BREEDEN & ASSOCIATES, PLLC**

HUTCHISON & STEFFEN, PLLC

8 /s/ Adam J. Breeden

/s/ Brittany A. Lewis

9 **ADAM J. BREEDEN, ESQ.**

COURTNEY CHRISTOPHER, ESQ.

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Attorneys for Defendants POKROY
MEDICAL GROUP OF NEVADA, LTD.,
d/b/a PEDIATRIX MEDICAL GROUP
and d/b/a PEDIATRIX EMERGENCY
MEDICINE OF NEVADA, YARON
IVAN, M.D., and VIPUL SINGLA, M.D

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19 **IT IS SO ORDERED**

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22 **UNITED STATES MAGISTRATE JUDGE**

23 **DATED:** 3-31-25
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